

REMARKS

Claims 1-26 are pending in the application.

Claims 1-26 are rejected.

Claims 1-26 are rejected under 35 U.S.C. 103(a).

Claims 1, 10, 12, 15-17 and 26 are currently amended.

No new matter is added.

Claims 1-26 remain in the case for consideration.

Applicant requests reconsideration and allowance of the claims in light of the above amendments and following remarks.

Claim Rejections – 35 U.S.C. § 103

Claims 1-26 are rejected under 35 U.S.C. 103(a) as being unpatentable over Background of the Invention in view of U.S. Patent No. 6,552,426 to Ishio, et al., in view of Koopmans (6,706,557) and further in view of Lin (6,333,562).

Applicants respectfully traverse the rejections.

Claims 1 and 10 have been amended to be further distinguished from the Ishio reference. These claims recite an insulating tape that insulates bonding wires, which are connected between pads on a substrate to pads on the lowest chip, from any contact or connection with the top chip. In other words, the insulating tape prevents bonding wires from another chip from having any contact or connection to a chip on which the insulating tape is attached.

In contrast, Ishio shows a top chip (1) with an electrode pad (2) and a first insulation film (3) having a connection with a bonding wire (8) from another chip. Ishio does not anticipate, teach, or make obvious claims 1 and 10 because the insulating film (3) does not insulate a first group of bonding wires (8) from contacting or connecting any part of the top chip (1).

Claim 17 has been amended to recite adhering an insulating tape to a backside of a top chip, to make explicit the tape-nature of the insulating tape element. No new matter has been added.

Ishio does not teach a tape-type material as an insulating tape attached to a top chip. In the office action mailed 3/22/05, the Examiner states that Ishio's first insulating film (3) corresponds to the insulating tape 63b of the claimed invention. Ishio's insulating film (3), however, is made of a SiN film and a polyimide film (Col. 5, line 65). These materials may

not be considered a "tape", as recited in the claims of the instant application because they are materials that are grown on a substrate, whereas a "tape" is a distinct layer that is not grown on the surface to which it is applied. In the method claim 17, the insulating tape is adhered, not grown or deposited on a surface, as would be the case for the material taught by Ishio.

Claim 26 has been amended to further distinguish this claim from Ishio by including language that a pad is between the two chips. Ishio does not teach this. Ishio only shows, in FIG. 1, pads (2) on a substrate (1) where the pads are not in a region between the two chips (substrates 1 and 5).

For at least these reasons, the cited references, either alone or in combination, do not teach or suggest all of the limitations of claims 1, 10, 17 and 26. Accordingly, the rejection does not present a *prima facie* case of obviousness, and the applicants submit that these claims are allowable.

Claims 2-9, 11-16 and 18-25 depend from their respective base claims 1, 10 and 17 and inherently include all of the limitations of their base claim. As discussed above, the prior art does not teach the limitations of the base claim much less the further embodiments of the dependent claims. Therefore, claims 2-9, 11-16, and 18-25 are allowable for their dependency and their own merits. Allowance of these claims is requested.

For the foregoing reasons, reconsideration and allowance of claims 1-26 of the application as amended is solicited. The Examiner is encouraged to telephone the undersigned at (503) 222-3613 if it appears that an interview would be helpful in advancing the case.

Respectfully submitted,

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